

FILED

JUL 07 2020

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,)	Case No. <u>20 CR 082 JED</u>
)	
Plaintiff,)	<u>INDICTMENT</u>
)	[COUNT 1: 18 U.S.C. §§ 1589(a),
v.)	1589(d), and 2 – Obtaining Forced
)	Labor;
RONALD ALEXANDER PAZ-)	COUNT 2: 18 U.S.C. §§ 1589(b),
RODRIGUEZ,)	1589(d), and 2 – Benefiting From
EVA ESTRADA JUAREZ,)	Forced Labor;
)	COUNT 3: 18 U.S.C. § 1584(a) –
Defendants.)	Involuntary Servitude;
)	COUNT 4: 18 U.S.C. § 1590(a) –
)	Trafficking With Respect to Peonage,
)	Slavery, Involuntary Servitude, and
)	Forced Labor;
)	Forfeiture Allegation: 18 U.S.C. §
)	1594(d) – Peonage and Slavery
)	Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. §§ 1589(a), 1589(d), and 2]

From on or about July 1, 2019, through on or about December 13, 2019, more exact dates being unknown to the Grand Jury, in the Northern District of Oklahoma, the defendants, **RONALD ALEXANDER PAZ-RODRIGUEZ** and **EVA ESTRADA JUAREZ**, aiding and abetting each other, did knowingly obtain the labor and services of D.Y.A., a minor child known to the Grand Jury, by any of the following means, and any combination thereof:

1. Force, threats of force, physical restraint and threats of physical restraint to her;
2. Serious harm and threats of serious harm to her;

3. The abuse and threatened abuse of law and legal process; and

4. One or more schemes, plans and patterns intended to cause her to believe that, if she did not perform such labor and services, she would suffer serious harm and physical restraint, and a combination of such means.

All in violation of Title 18, United States Code, Sections 1589(a), 1589(d), and 2.

COUNT TWO
[18 U.S.C. §§ 1589(b), 1589(d), and 2]

From on or about July 1, 2019, through on or about December 13, 2019, more exact dates being unknown to the Grand Jury, in the Northern District of Oklahoma, the defendants, **RONALD ALEXANDER PAZ-RODRIGUEZ** and **EVA ESTRADA JUAREZ**, aiding and abetting each other, did knowingly benefit, financially and by receiving anything of value, from participation in a venture that had engaged in the providing and obtaining of labor of D.Y.A., a minor child known to the Grand Jury, by any of the following means, and any combination thereof:

1. Force, threats of force, physical restraint and threats of physical restraint to her;
2. Serious harm and threats of serious harm to her;
3. The abuse and threatened abuse of law and legal process; and
4. One or more schemes, plans and patterns intended to cause her to believe that, if she did not perform such labor and services, she would suffer serious harm and physical restraint; knowing and in reckless disregard of the fact that the venture had engaged in the providing and obtaining of labor and services of D.Y.A. by any of such means.

All in violation of Title 18, United States Code, Sections 1589(b), 1589(d), and 2.

COUNT THREE
[18 U.S.C. §§ 1584(a) and 2]

From on or about July 1, 2019, through on or about December 13, 2019, in the Northern District of Oklahoma, the defendants, **RONALD ALEXANDER PAZ-RODRIGUEZ** and **EVA ESTRADA JUAREZ**, aiding and abetting each other, did knowingly and willfully hold D.Y.A., a minor child known to the Grand Jury, to a condition of involuntary servitude for a term.

All in violation of Title 18, United States Code, Sections 1584(a) and 2.

COUNT FOUR
[18 U.S.C. §§ 1590(a) and 2]

From on or about January 1, 2019, through on or about December 13, 2019, in the Northern District of Oklahoma and elsewhere, the defendants, **RONALD ALEXANDER PAZ-RODRIGUEZ** and **EVA ESTRADA JUAREZ**, aiding and abetting each other, did knowingly recruit, harbor, transport, provide, and obtain D.Y.A., a minor child known to the Grand Jury, for labor and services in violation of Title 18, United States Code, Chapter 77, that is, involuntary servitude in violation of Title 18, United States Code, Section 1584, and forced labor in violation of Title 18, United States Code, Section 1589.

All in violation of Title 18, United States Code, Sections 1590(a) and 2.

FORFEITURE ALLEGATION
[18 U.S.C. § 1594(d)]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594(d).

Upon conviction of the offenses alleged in this Indictment, as a part of their sentences, the defendants, **RONALD ALEXANDER PAZ-RODRIGUEZ** and **EVA ESTRADA JUAREZ**, shall forfeit to the United States, any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations, and any property, real or personal, that was used or intended to be used to commit or to facilitate the violation of federal law. The property to be forfeited includes, but is not limited to:

MONEY JUDGMENT


A money judgment in an amount of at least \$6,600.00, representing proceeds obtained by the Defendants as a result of the offenses;

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the

jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 1594(d).

R. TRENT SHORES
UNITED STATES ATTORNEY


CHRISTOPHER J. NASSAR
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson
Grand Jury Foreperson